

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:

**Vikki M. Sanchez,
Thomas Sanchez, and
Shernoff, Bidart &
Darras**

Respondents.

Matter Under Review 5454

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**JOINT RESPONSE OF VIKKI SANCHEZ, THOMAS SANCHEZ,
AND SHERNOFF, BIDART & DARRAS
TO THE COMPLAINT BY PAUL R. HOLLRAH**

On behalf of Vikki M. Sanchez, Thomas Sanchez, and Shernoff, Bidart & Darras (collectively, the "Respondents"), we respectfully submit this joint response to the complaint filed in the above captioned matter under review ("MUR") by Paul R. Hollrah.

For the reasons set forth herein, the Respondents respectfully request that the Commission find no reason to believe the Respondents violated the Federal Election Campaign Act (the "Act") or Federal Election Commission ("Commission") regulations and dismiss them from this matter under review.

In short, Mr. Hollrah's complaint against the Respondents should be dismissed because it is based on precisely the same information that formed the basis of MUR 5366. In that matter,

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the Commission found no reason to believe the Respondents violated the Act.¹ See Federal Election Commission no reason to believe finding, MUR 5366, April 29, 2004, attached hereto as Exhibit 1.

More specifically, the allegations in MUR 5366 were based on two newspaper articles – one in *The Hill* newspaper and another in the *Washington Post* – that questioned the propriety of contributions made to Edwards for President by employees of several law firms, including a contribution by Ms. Sanchez of Shernoff, Bidart & Darras.

In the instant complaint, Mr. Hollrah refers to the same article in *The Hill* that formed the basis of MUR 5366. However, rather than citing any new or additional information,² Mr.

Hollrah states:

In the months since the published report by *The Hill*, I have seen no evidence that the FEC has investigated this matter, fulfilling its obligation to the people, or that violators have been prosecuted. This, in spite of the fact that the matter in question may represent the most massive violation of federal campaign law ever recorded.

Hollrah Complaint at 3.

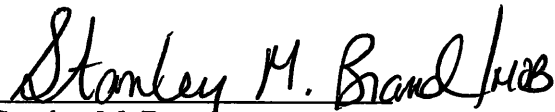
Mr. Hollrah is apparently unaware that the Commission dismissed the Respondents from that matter. Nevertheless, because Mr. Hollrah's complaint is based entirely on the same information as MUR 5366, and because Mr. Hollrah has provided no new or additional information with regard to the allegations made in MUR 5366, we respectfully request that the

¹ Mr. Sanchez was not made a respondent in MUR 5366.

² Mr. Hollrah stated in his complaint that he "enclose[d] texts of newspaper reports from *The Hill*, along with the text of a weekly newspaper column that I write. The column dealing with the apparent violations cited above is titled, 'The Skunk at the Sunday School Picnic.'" Hollrah Complaint, at 3. However, the enclosed text apparently authored by Mr. Hollrah was titled "Mrs. John Kerry" and made no mention of Senator Edwards or contributions to his presidential campaign.

Commission find no reason to believe the Respondents violated the Act or Commission regulations and dismiss them from this matter under review.

Respectfully submitted,

A handwritten signature in black ink, reading "Stanley M. Brand" followed by a stylized monogram "HAB".

Stanley M. Brand

Counsel for Respondents

Brand & Frulla, P.C.

923 15th Street, Northwest

Washington, D.C. 20005